

**UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

STRUDEL HOLDINGS LLC and
AVR AH LLC,

Debtors.

Chapter 11

Case No. 23-90757 (CML)

(Jointly Administered)

**SECURED PARTIES' EXHIBIT AND WITNESS LIST FOR
NOVEMBER 30, 2023 STATUS CONFERENCE**

Nineteen77 Capital Solutions A LP, Bermudez Mutuari, Ltd. (“Lenders”) and UBS O’Connor LLC (collectively the “Secured Parties”), file this Exhibit and Witness List for the status conference to be held on November 30, 2023 before the Honorable Christopher Lopez at the United States Bankruptcy Court for the Southern District of Texas, Courtroom 401, 515 Rusk Street, Houston, Texas 77002 (the “Hearing”).

EXHIBITS

Exhibit Number	Date	Description	Docket
Secured Parties Exhibit 1	10/24/2023	Fully Executed Purchase Agreement between Chiron AVR LLC and AVR AH LLC	Dkt. 276-2
Secured Parties Exhibit 2	11/15/2023	Draft DIP Budget Provided by Debtors’ to Secured Parties	Dkt. 276-3
Secured Parties Exhibit 3	11/20/2023	Estoppel Certificate Provided by Debtors’ to Secured Parties.	Dkt. 276-4
Secured Parties Exhibit 4	11/27/2023	HOA Pre-Petition and Post-Petition Liabilities	Dkt. 276-5
Secured Parties Exhibit 5	11/27/2023	Chiron AVR LLC’s Account Balance	Dkt. 276-6

Secured Parties Exhibit 6	11/27/2023	Draft Second Amendment Addressing the Outstanding Unpaid HOA Liabilities	Dkt. 276-6
Secured Parties Exhibit 7	11/19/2023	Fidelity National Financial, Inc., Form 8-K	Dkt. 276-7
Secured Parties Exhibit 8	9/27/2023	Order Authorizing the Debtors to Obtain Postpetition Financing	Dkt. 163
Secured Parties Exhibit 9	9/27/2023	Order Authorizing Retention and Employment of Stout Risius Ross, LLC	Dkt. 166
Secured Parties Exhibit 10	11/09/2023	Order Authorizing and Approving the Sale of Assets Free and Clear of All Liens, Claims, and Encumbrances	Dkt. 245
Secured Parties Exhibit 11	11/27/2023	Debtors' Emergency Motion for Status Conference	Dkt. 265
Secured Parties Exhibit 12	11/21/2023	Notice of Default under Purchase Agreement	Dkt. 265-1
Secured Parties Exhibit 13	11/22/2023	First Amendment to Agreement for Purchase and Sale of Real Property	Dkt. 265-3
Secured Parties Exhibit 14	11/29/2023	Monthly Operating Report	Dkt. 270
Secured Parties Exhibit 15	Any exhibit necessary to rebut the evidence or testimony of any witness offered or designated by any other party.		
Secured Parties Exhibit 16	Any exhibit listed by any other party.		

WITNESSES

1. Randal Johnson (Remote).
2. Rebuttal witnesses as necessary.
3. Any witness listed by any other party.

The Secured Parties reserve the right to amend or supplement this Exhibit and Witness List as necessary in advance of the Hearing. The Secured Parties reserve the right to use any

exhibits presented by any other party and to ask the Court to take judicial notice of any document. The Secured Parties reserve the right to introduce exhibits previously admitted.

Dated: New York, New York
November 30, 2023

ORRICK HERRINGTON & SUTCLIFFE LLP

/s/ Laura Metzger
Laura Metzger (*pro hac vice*)
Darrell S. Cafasso (*pro hac vice*)
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